

Draft Summary of Topical Comment Areas on the Draft Tritium Sampling Plan

<p>1. Perform groundwater monitoring as suggested by the RWQCB. Use as a pathway for the EPA HRS.</p> <p>6/1, p. 7, 2 and 11; 6/1, p. 13, 4; 6/1, p. 89, 12 ff.; 6/1, p. 91, 3; 6/1, p. 108, 13 ff.; 4/25, p. 56, 14; 4/25, p. 57, 10 ff.</p> <p>Add groundwater sampling in coordination with the RWQCB (Franke).</p>
<p>2. Ensure that community requests are included and implemented.</p> <p>6/1, p. 28, 16; 6/1, p. 60, 5.</p>
<p>3. Gather data by standardized protocols recognized by regulatory agencies. (See also OBT concerns below).</p> <p>6/1, p. 57, 5 and 20; 6/1, p. 92, 19.</p>
<p>4. The Lab should perform bioassays (urinalysis) of individuals both on-site and at LHS.</p> <p>4/25, p. 4, 22-24; 6/1, p. 87, 15 ff.; 4/25, p. 87, 14; 4/25, p. 90, 15.</p>
<p>5. Add more information for a layperson reading the plan, i.e., why sample at this location, and what use will be made of the information being gathered, why rainwater? (6/1, p. 85, 13 ff.). Give more information on radioactivity (6/1, p. 86, 7 ff.). Try to make it more understandable to the community (6/1, p. 86, 21).</p>
<p>6. a. Do vegetation sampling. Include the Menchaca study for review as a model of a sampling plan for vegetation.</p> <p>6/1, p. 67, 3; 6/1, p. 68, 20; 6/1, p. 89, 4 ff. and 21; 6/1, p. 111, 16 ff..</p> <p>b. Include the OBT that was measured at the Lab in '94 and '96 in the EPA review. Is there a clear protocol for gathering OBT data? How does one distinguish OBT from tritium-bound water? How are samples prepared and analyzed? Discussion of OBT could help here (6/1, p. 87, 21), although most of tritium is in water, not OBT.</p> <p>6/1, p. 72, 15; 6/1, p. 78, 7; 6/1, p. 87, 21; 6/1, p. 95, 16; 4/25, p. 80, 7; 4/25, p. 86, 25 ff..</p> <p>c. Do tree ring analysis and dose reconstruction.</p> <p>6/1, p. 90, 8 ff.; 6/1, p. 95, 7.</p>

7. Sampling should be done for ALL of the radionuclides that have been used or manufactured at the facility during the past decades, and the site should be evaluated as a whole.

6/1, p. 97, 18 ff. and p. 98, 12.

8. Move the meteorological station (?) further up the hill closer to LHS, and add two new air sampling stations (6/1, p. 91, 13 ff.).

Expand ambient air monitoring for tritium to 16 wind directions (Franke).

9. Appropriate models should be used to determine the probability of an individual at the fence line receiving a dose of greater than 10 mrem/yr (Franke).

10. Some corrections to measurements of tritium in ambient air at a given location are necessary because of associated minor uncertainties (Franke).

11. A preliminary sampling effort for soil and groundwater around Calvin Lab is recommended (Franke).

12. The HASL-300 core method should be used for soil sampling (Franke).